

From: [Casey, Carolyn](#)
To: ["Miano, John \(DEP\)"](#)
Cc: ["Coolen, Chris \(DEP\)"](#)
Subject: RE: Cummings Center Progress Report
Date: Tuesday, March 20, 2018 1:39:00 PM
Attachments: [Technical Review of the data presented in the January 2018 Progress Report.pdf](#)

I think you want the Nov/Dec Report. Just sent a link to all three progress reports. Hope it works!

I may have questions for you and/or request your feedback on the Jan prog report with the new VI data.

FYI - Attached are our comments on the first 2 progress reports (Nov/Dec and Jan) that I sent them after a cursory review of the info contained in the reports.

I went back to look as well and although I can't find the GW data right now, I did find Appendix A, concentration maps, to the Phase II Risk Assessment and I do see they identified cis1,2DCE in GW in the same area as well FSL-7 but at conc of 35 ppb, not 1 ppm. Xylene in soils at 9400 – 79000 mg/kg and nothing for ethylbenzene. Note these are not the easiest concentration maps to read.

Section 6 of the Nov Dec Progress report states the following...

The location of FSL-7 is in proximity to the historic well locations of B2, B3, B22, and B23 which had historic detections of naphthalene, tetrachloroethene, 1,2-dichloroethene, and 1,2-dichloroethane in groundwater. It is possible that the compounds detected in FSL-7 may represent a similar condition that was detected in the 1980s when former wells B2, B3, B22, and B23 were sampled. The detections of ethylbenzene and xylenes in FSL-7 are not consistent with the historic data however as those compounds were not historically detected in the area.

None of the detected constituents in soil or groundwater are at concentrations that represent an Imminent Hazard condition, so no immediate actions are necessary. Groundwater at these locations will be monitored for the next 3 quarters with the next sampling event at these wells to occur in March 2018.

Thanks for taking a look!
Carolyn

From: Miano, John (DEP) [mailto:John.Miano@MassMail.State.MA.US]

Sent: Tuesday, March 20, 2018 10:46 AM

To: Casey, Carolyn <Casey.Carolyn@epa.gov>

Cc: Wainberg, Daniel <Wainberg.Daniel@epa.gov>; Coolen, Chris (DEP) <chris.coolen@state.ma.us>

Subject: RE: Cummings Center Progress Report

Hi Carolyn,

Can you send me, or help me locate, the Progress Report dated March 14, 2018 for the former United Shoe Machinery Division parcel in Beverly. We want to compare the original notification, and data at that time, to this new information at FSL-7.

Thank you,

Jack

John F. Miano

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MassDEP e-newsletter: mass.gov/dep/public/publications/enews.htm

MassDEP web site: mass.gov/dep

From: Bruce Hoskins [<mailto:BHoskins@FslAssociates.com>]

Sent: Thursday, March 15, 2018 3:57 PM

To: Miano, John (DEP); Johnson, Stephen (DEP); 'Casey, Carolyn'

Cc: Alexander, Lisa (DEP); 'Wainberg, Daniel'; 'Zucker, Audrey'; 'Craig Ziady'

Subject: RE: Cummings Center Progress Report

Carolyn:

As we discussed during the conference call, we do not believe the concentrations of ethylbenzene, xylene, and cis-1,2-DCE in groundwater represent a new reporting condition for the MCP. None of these compounds in this area are new – they were all detected in the 1987-89 Phase II investigation. As was noted in the Written Proposal/Sampling and Analysis Plan for the former USM property, the new well FSL-7 was meant to be a replacement to historical wells in the vicinity (B-2, B-3, B-22, B-23) where several elevated chlorinated VOCs were detected including cis-1,2-DCE. As we stated in the call, FSL-7 is located within the former “Area 2.8” remediation area from the 1997 Phase IV Remedy Implementation where very high levels of naphthalene, ethylbenzene, and xylenes were found in the soil both above and below the water table. While the detected concentrations may be a bit puzzling, the presence of those contaminants is consistent with what was found previously.

From a vapor intrusion perspective, FSL-7 is downgradient of the closest building (Building 500). And (as noted in the data summary in the January Progress Report), there were no significant detections of ethylbenzene, xylene, and cis-1,2-DCE in either soil gas under Building 500 or indoor air inside Building 500.

Additional rounds of data (groundwater this month and vapor intrusion data next month) will hopefully provide clarity and/or consistency on what we have detected in December 2017 and January 2018, but the initial conclusion is no significant vapor intrusion is present and groundwater

contaminants found in well FSL-7 was consistent with previous data.

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From: Miano, John (DEP) [<mailto:John.Miano@MassMail.State.MA.US>]
Sent: Thursday, March 15, 2018 3:12 PM
To: Johnson, Stephen (DEP)
Cc: Bruce Hoskins; Alexander, Lisa (DEP); Wainberg, Daniel; Zucker, Audrey; Craig Ziady; Casey, Carolyn
Subject: RE: Cummings Center Progress Report

From: Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]
Sent: Thursday, March 15, 2018 2:09 PM
To: Craig Ziady
Cc: Bruce Hoskins; Miano, John (DEP); Alexander, Lisa (DEP); Wainberg, Daniel; Zucker, Audrey
Subject: RE: Cummings Center Progress Report

Craig and Bruce, I am following-up on the call we had on Monday regarding the January 24, 2018, progress report comment on a potential 120-day notification.

EPA and MassDEP had our bi-monthly RCRA Corrective Action planning meeting today and I asked for clarification about the need for a 120-day notification for the elevated concentration of COC in monitoring well FSL-7 near the upper Shoe Pond and building 500. The concentrations of ethylbenzene, xylene and cis-1,2-dichloroethylene in groundwater in the 1-35 ppm range may require a 120-day notification since it does not appear to be related to a previously identified source in the area. Further it does not appear to be consistent with what was previously identified on site as a significant source of soil or groundwater contamination. Although I do realize petroleum hydrocarbons were widely detected during previous investigations, I do not recall the cis-1,2-DCE being significant and I do not recall anything other than 111-TCA being significant in groundwater in previous investigations.

You may want to discuss this further with Jack and/or Lisa, who I have included in this email.

I am not sure why I did not include this in my progress report comments, but there is also some concern with the proximity of this well FSL-7 to building 500 with respect to these concentration in groundwater and vapor intrusion. Table 4 should likely include the groundwater data from this well, the soil gas data and the indoor air data when evaluating the multiple lines of evidence.

Thanks
Carolyn

Carolyn J. Casey

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From: Craig Ziady [<mailto:craig@cummings.com>]
Sent: Wednesday, March 14, 2018 3:16 PM
To: Casey, Carolyn <Casey.Carolyn@epa.gov>
Cc: Zucker, Audrey <Zucker.Audrey@epa.gov>; Wainberg, Daniel <Wainberg.Daniel@epa.gov>;
Bruce Hoskins <BHoskins@FslAssociates.com>; Gregory Flaherty <gxf@cummings.com>
Subject: Cummings Center Progress Report

Hi Carolyn – Please find enclosed the Progress Report dated March 14, 2018 for the former United Shoe Machinery Division parcel in Beverly. Thank you for allowing an additional day to submit this report due to yesterday's storm.

Please let me know if you have any questions.
Thank you.
Craig

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